



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF WATER POLLUTION CONTROL  
401 CHURCH STREET  
L & C ANNEX 6TH FLOOR  
NASHVILLE TN 37243**

January 6, 2012

Ms. Janice S. Casteel  
City Manager  
City of Cleveland  
190 Church Street, N.E.  
P.O. Box 1519  
Cleveland, TN 37364

Subject: **NPDES Permit No. TN0080934  
Cleveland Municipal Airport  
Cleveland, Bradley County, Tennessee**

Dear Ms. Casteel:

The Division of Water Pollution Control (division) received a letter dated November 29, 2011, from Brent Wood and Elizabeth Porter of S&ME, Inc., requesting a reduction in stormwater monitoring requirements for the new Cleveland Municipal Airport (Airport) site in Bradley County, Tennessee, until Phase 3 of construction commences. This letter serves as the division's response to the requests provided in that letter.

1. The above mentioned letter had requested permanent removal of Outfalls SW-2, SW-4, SW-7, SW-8, SW-8A, and SW-9 from the monitoring program. Based upon a phone conversation between Brent Wood of S&ME and Erin O'Brien of our office on January 5, 2012, it is the division's understanding that the Airport no longer wants these outfalls to be removed from the permit and the Airport understands that DMRs will still need to be submitted for these outfalls.
2. Monitoring at Outfalls SW-1 (SB-6), SW-10, and SW-11 may be discontinued until Phase 3 construction begins. The Airport must continue to submit DMRs for these Outfalls but may mark the "No Discharge" box if no construction stormwater discharges occur at any time in the monitoring period.
3. Division staff have recorded several issues with sediment basin SB-1 where turbid stormwater has bypassed and exited the airport property in the area of Outfall SW-3; consequently, the division has determined that monitoring must be continued for Outfall SW-3 according to the terms of the permit. Further, the division requests that the Airport re-evaluate the adequacy of the erosion prevention and sediment controls [including sediment basin SB-1] serving Outfall SW-3 in light of current and planned site conditions when construction activities at the site resume in Phase 3.
4. A recent site visit on November 22, 2011, [with staff from EPA, headquarters office], revealed that sediment basin SB-2 continues to have very turbid water in the upper half of the basin; it was also noted that areas drained by slope drains directed to SB-2 and SB-4 lacked vegetative cover adequate to prevent additional sediment from entering the sediment basins. Therefore, monitoring must continued for Outfall SW-6 according to the terms of the permit until it can be demonstrated that adequate stabilization has been achieved.
5. Continuous monitoring of Outfall SW-5 may be replaced with monthly monitoring until Phase 3 construction begins. While vegetation has started on the runway area, mobilization of sediment has still

been noted, meaning that there was not adequate vegetative cover to reduce the mobilization of sediment during rain events.

6. The requested modification to the "Continuous In-Stream Monitoring of Little Chatata Creek" will be allowed until Phase 3 construction begins. Per this request the division is authorizing the continuous in-stream monitoring to be conducted at a rate of once every two hours; and TSS sampling, visual observations, duplicate flow, and duplicate turbidity may be conducted at a rate of once every two weeks. Equipment calibration frequency is not specified in the permit as the division maintains that it should be based upon manufacturer specifications.
7. Per IV.D.8.b.a) of the permit, the permittee is allowed to conduct monthly inspections if the site has been temporarily stabilized. Subsection IV.D.8.b of the permit also allows an inspection conducted by a licensed professional engineer to be used to satisfy an inspection requirement. Based on these requirements, the division agrees that a once per month inspection conducted by the Airport's engineer [per the requirements of IV.D.8.a] may be used to satisfy the inspection requirements of the permit until Phase 3 construction begins.

If you have questions, please contact Dr. Dick Urban in the Chattanooga Environmental Field Office at (423) 634-5702 or by E-mail at [Richard.Urban@tn.gov](mailto:Richard.Urban@tn.gov); or, at this office, please contact Ms. Erin O'Brien at (615) 253-2245 or by E-mail at [Erin.O'Brien@tn.gov](mailto:Erin.O'Brien@tn.gov).

Sincerely,



Vojin Janjić  
Manager, Permit Section  
Division of Water Pollution Control

P/WAT-3  
Enclosure

cc/ec: Permit Section File  
Chattanooga Environmental Field Office ([Richard.Urban@tn.gov](mailto:Richard.Urban@tn.gov))  
E&C Section, Dana.Waits@tn.gov  
Ms. Elizabeth Porter, P.G., Project Manager, S&ME, Inc., [lporter@smeinc.com](mailto:lporter@smeinc.com)  
Mr. Brent C. Wood, P.E., CPESC, Staff Engineer, S&ME, Inc., [bwood@smeinc.com](mailto:bwood@smeinc.com)  
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